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June 10, 1993

RECEIVED

JUN 17 1993

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

Handwritten signature/initials

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Educational Program Consolidation

ITFS licensees need to be able to have scheduling flexibility when programming ITFS channels that have excess capacity airtime leased to a wireless cable operator. Because the academic class schedules of educational institutions are all different, educators need to be able to adapt their ITFS airtime schedules based on their instructional needs and educational program distribution priorities. Elementary and secondary school districts usually have the largest ITFS airtime demand for class transmissions between 8am and 4pm Monday through Friday. Colleges and universities can have classes scheduled at any time between 7:30am and 10pm Monday through Sunday. Higher education classes can be offered in one to three hour blocks one to five times per week in quarter or semester segments or they can have all day seminars, colloquia or videoconferences that last from one to three days. Channel loading of an ITFS licensee's educational programming onto one, two or three of the licensee's four ITFS channels would allow the ITFS licensee the flexibility to develop a program schedule of non interrupted segments simultaneously airing on as many of its channels as are needed to meet the institution's academic scheduling priorities. By allowing educational program channel loading on any of the ITFS, MDS or OFS channels in a wireless cable operation, ad hoc one, two or three day educational programs such as seminars, colloquia, visiting scholar lectures or videoconferences can be more easily accommodated without disrupting the regularly scheduled full semester or quarter classes.

When UC leases excess ITFS airtime, channel mapping has proven a useful tool which allows UC's educational programming to consistently appear on the same television channel at UC receive sites. However, channel mapping is not a mature technology and still requires significant adjustments to allow stereo and mono transmissions to be carried on the same channel and to allow smooth transition when scrambled channels are switched from one signal input channel to another. The disruptiveness of these adjustments and switching interruptions can be minimized by consolidating the ITFS licensee's educational programming into as large a continuous program segment as possible. As long as an ITFS licensee transmits at least 80 hours per week of educational programming, there does not appear to be any reason to prevent an ITFS operator from consolidating its programs on one, two or three of its own channels or on any of the other educators' ITFS channels in the wireless cable system or even on any or all of the wireless cable operator's commercial channels, such as MDS-1 or 2 or the commercial E, F or H-channels.

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Recommendation:

The Commission should allow each ITFS licensee which leases excess airtime to a wireless cable operator and which can benefit from channel loading its educational programming on fewer than all four of its ITFS channels to channel load on any of the ITFS, OFS or MDS channels which are operated together as part of a wireless cable system, so long as each ITFS licensee airs at least 80 hours of educational programming per week and has access, as needed, to an additional 80 hours per week of airtime through the ready recapture mechanism.

Waiver Request

The Commission should allow channel loading of educational programming where it is justified. However, the norm for ITFS channel licensees should continue to be some educational programming on all four ITFS channels. The ITFS licensees which need channel loading to address the technical disruptions of channel programming with the special academic scheduling

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Interim Solution

Because digital compression technology is expected to be widely available by 1998 to address some of the technical and scheduling conflict problems currently experienced by ITFS licensees which are leasing excess airtime on channel mapped systems, the Commission should allow channel loading on an interim basis of no longer than five years. Since the digital compression technology is still being refined, the Commission should allow channel loading for at least three years in order to allow the sophistication of the digital equipment to be increased and the price to be reduced as much as possible before widescale implementation is expected.

Recommendation:

The Commission should allow channel loading of educational programming on fewer than all four of an ITFS licensee's channels for a minimum of three years and a maximum of five years. The Commission can revisit the channel loading issue in five years if digital compression technology is not sufficiently widely available at a reasonable cost to address the problems being cured by channel loading.

FCC ITFS Advice Telephone Line

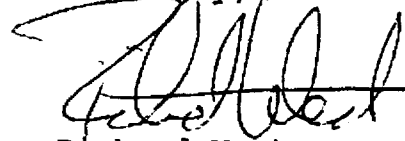
ITFS licensees have varying levels of experience and resources



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If there is additional information on the usefulness of channel loading to UC ITFS operations which we can provide you, please contact Ms. Willi Bokenkamp of this office at (510) 987-0373.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard West', written over a horizontal line.

Richard West
Associate Vice President
Information Systems and
Administrative Services

Enclosure: 9 copies of this Comment for FCC distribution